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Counsel for International Union, United  
Automobile, Aerospace and Agricultural  
Implement Workers of America (UAW)

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	
	)	Chapter 11
In re DELPHI CORPORATION, et al.,	)	
	)	05-44481 (RDD)
Debtors.	)	(Jointly Administered)

**NOTICE OF APPEARANCE  
AND REQUEST FOR NOTICE**

PLEASE TAKE NOTICE that pursuant to Rules 2002, 3017, 9007 and 9010 of the Rules of Bankruptcy Procedure, and 11 U.S.C. §342 and §1109(b), the undersigned counsel appears for International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) which is a creditor and party in interest in this proceeding, and request that all notice given or required to be given in this action and all related actions, be given and served upon:

Joseph J. Vitale  
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers, whether formal or informal, ex parte or on notice, written or oral, referred to in the Bankruptcy Rules and Code sections specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier or otherwise, which affect or seek to affect in any way any rights or interests of the Debtors.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleading claim, or suit shall waive the above-named entities' right to have final orders in noncore matters entered only after de novo review by a District Judge; or the right to trial by jury in any proceeding related to this case; or the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or to adjudicate rights in other applicable forums, or any other rights, claims, actions, defenses, setoffs, or recoupments to which these entities are or may be entitled under agreements, in law or in equity, all of which rights are expressly reserved.

Dated: October 11, 2005  
New York, New York

COHEN, WEISS, AND SIMON LLP

By: /s/ Joseph J. Vitale

Joseph J. Vitale (JV-0415)  
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Counsel for International Union, United  
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Implement Workers of America (UAW)

Certificate of Service

I hereby certify that on this 11th day of October 2005 I caused a true and correct copy of the foregoing Notice to be served by first-class mail, postage prepaid upon:

John Wm. Butler, Jr.  
Skadden, Arps, Slate, Meagher & Flom LLP  
333 West Wacker Drive, Suite 2100  
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Kayalyn A. Marafioti  
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Alicia M. Leonard  
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Southern District of New York  
33 Whitehall Street, Suite 2100  
New York, NY 10004

/s/ Joseph J. Vitale

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